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TSCA Document Processing Center
U.S. Environmental Protection Agency
Mail Code 7407M
EPA East Building, Room 6428
1200 Pennsylvania Avenue, NW
Washington, DC 20460



Attention: Section 8(e) Coordinator

November 5, 2003

Contain No CBI

Dear Coordinator:

Rohm and Haas Company submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act.

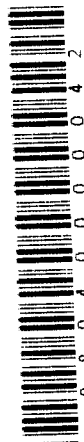
This letter transmits preliminary reproductive and development toxicity effects observed on TP-90B Rubber Chemical [hexaoxatricosane (CASRN143-29-3)]. This chemical substance is being tested under the Rohm and Haas Company High Production Volume (HPV) testing program.

In this study, groups of 10 male and female rats each were dosed at 0 (Controls), 10, 100, and 800 mg/kg/day by gavage in a 0.5% carboxymethyl cellulose vehicle. All groups were dosed both before and after mating, covering a minimum of 28 days, through pre- and post-mating. These doses were selected on the basis of a range-finding study.

Animals were observed daily for appearance, behavior, mortality and morbidity. Clinical signs were reported weekly with a full assessment of the nervous system (a functional-observational battery) and blood work performed during the final week of the study.

Preliminary results in this study suggest a decreased pregnancy rate in the high dose female group(800 mg/kg/day), with only 30% of the mated animals becoming pregnant. Of the three pregnant females in the high dose group, one of them produced a litter of 10 pups. However, three pups in this litter exhibited an unusual anomaly. These pups were either missing or had shortened digits on their forelimbs and/or hindlimbs. Another female in the high dose group had a litter which produced only five pups available for examination. This was due to either reduced litter size or because the mother destroyed or cannibalized its offspring. The findings from the remaining females are being assessed and tabulated to make conclusions about average litter size, weight, implantation sites, fetal viability, and etc.

It was also observed in this study that in the high dose female group(800 mg/kg/day) signs of central nervous system intoxication were immediately evident (within 15 minutes) following dosing. The following signs were observed: lethargy, ataxia, prostration, piloerection, hunching, and difficulty breathing. Hyperexcitability or irritability was also noted during animal handling. The signs seemed to improve after



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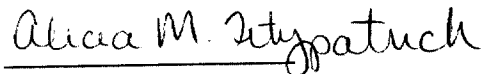
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four hour post-dosing, and generally lessened in incidence with increasing time. Signs of central nervous system intoxication were observed only in the high dose female group, similar to those signs previously submitted in submittal number 8EHQ-03-15322.

Rohm and Haas Company does not consider the exact identity of this chemical to be Confidential Business Information (CBI).

If you have any questions concerning this submittal, please do not hesitate to contact me at (215) 592-6978.

Sincerely,

A handwritten signature in cursive script that reads "Alicia M. Fitzpatrick". The signature is written in dark ink and is positioned above the printed name.

Alicia M. Fitzpatrick

TSCA Manager

Product Integrity Department